

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF ILLINOIS**

IN RE: KIONNA FOX

)

Chapter 13

)

Case No. : 15-30622

Debtor.

)

**MOTION FOR CONTINUATION  
OF AUTOMATIC STAY**

Now comes the Debtor by and through her undersigned attorney and for her Motion states as follows:

1. The Debtor filed the present chapter 13 case on April 21, 2015
2. That Debtor had a prior chapter 13 case pending within the past year.
3. That Debtor's case was dismissed for failure to make plan payments.
4. That Debtor lost her employment during the prior case and was unable to continue making her monthly plan payments.
5. That Debtor has new employment and will be earning sufficient income to enable her to make her Chapter 13 monthly plan payments.
6. That Debtor prays this Court continue the automatic stay to enable Debtor to keep her vehicle and to provide for her other general and priority unsecured debts accordingly.
7. That Debtor desires this Court to continue the automatic stay under §362(c) and find that Debtor has filed his second case in good faith.

Wherefore, the Debtor prays that this Court continue the automatic stay pursuant to §362(c) and for such other relief as this Court deems just and reasonable.

RESPECTFULLY SUBMITTED,

By: /s/Michael J. Benson

Michael J. Benson #6284397

A BANKRUPTCY LAW FIRM, LLC.

Attorney for Debtor

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**CERTIFICATE OF SERVICE**

Comes now Debtor, KIONNA FOX by and through their attorney, and certify that on April 22, 2015 via first-class mail, postage prepaid, a true and accurate copy of the Motion to Continue Automatic Stay was served upon the following people that were not served electronically:

Russell C. Simon  
Chapter 13 Trustee  
24 Bronze Pointe  
Swansea, IL 62226

U.S. Trustee  
Becker Building, Ste. 1100  
401 Main St.  
Peoria, IL 61602

All creditors listed on matrix.

/s/Devon Randolph